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Sent: Thursday, March 15, 2012 8:57 AM

To: Baskin, Kathleen (EEA)

Cc: Linda.Orel@maccweb.org; Kenneth.Kimmell@state.ma.us; Griffin, Mary (FWE); Edward.Lambert@state.ma.us; Phillip.Griffiths@state.ma.us

Subject: Sustainable Water Management

Please strengthen the Sustainable Water Management Initiative (SWMI) "Framework" proposal of February 3, 2012 to make it truly sustainable for the future. Like many busy citizens, I count on my government to consider the long-term and big-picture implications of any action, and I urge you to take the need for true sustainability to heart.

I'm grateful for the effort made by state staff and others to the SWMI process. The scientific findings and development of ecologically-based streamflow criteria represent a major step forward. However, the weaknesses in the proposed Framework undermine its effectiveness and would make it impossible to achieve truly sustainable water management. These deficiencies must be addressed.

The goal of sustainable water management should be to use water wisely, so that our rivers, streams, and wetlands have enough clean water to support healthy populations of native fish and other species. Protecting rivers that are healthy, and restoring those that are not, should be explicit goals of SWMI.

Currently, 292 sub-basins in Massachusetts – more than 20 percent – are seriously degraded by water withdrawals, and another 227 are losing fish and could fall into the degraded category if subjected to increased withdrawals. Yet the SWMI Framework proposes yield withdrawal limits several times higher than the latest science indicates is safe for fish; exempts some permitted withdrawals from having to fully minimize and mitigate the impacts of their withdrawal; and allows "non-essential" water use when flows are below safe levels. This is not sustainable water management.

Nothing in the SWMI proposal will prevent vulnerable rivers, streams, and wetlands from being pumped dry, which is unacceptable. We can and must do better. We must seize this opportunity to begin restoring our degraded rivers, streams, and wetlands. We should start by establishing protective safe yield withdrawal limits consistent with the latest research.

Thank you for your consideration.

Sincerely,

Mary Harbaugh
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